

**FILED**

JUL 13 2016

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA

Mark C. McCartt, Clerk  
U.S. DISTRICT COURT

UNITED STATES OF AMERICA,

Plaintiff,

v.

TIMOTHY JAMES RAY

IGNATOVICH,

a/k/a "Iggy",

a/k/a "TJ",

JOSHUA EDWARD KREPPS,

Defendants.

) Case No. **16 CR 085 JED**

) **INDICTMENT**

) [COUNT 1: 18 U.S.C. § 1201(c) –

) Conspiracy to Commit Kidnapping;

) COUNT 2: 18 U.S.C. §§ 1201(a)(1) and

) 1201(d) – Kidnapping;

) COUNTS 3 and 4: 18 U.S.C. §§

) 1201(a)(1), 1201(d), and 1201(g) –

) Kidnapping of Children;

) COUNT 5: 18 U.S.C. §§ 922(g) and

) 924(a)(2) – Felon in Possession of a

) Firearm and Ammunition;

) COUNT 6: 18 U.S.C. § 924(c)(1)(A)(i) –

) Carrying and Use of a Firearm During

) and in Relation to a Crime of Violence]

**THE GRAND JURY CHARGES:**

**COUNT ONE**

[18 U.S.C. § 1201(c)]

**THE CONSPIRACY**

1. From at least on or about June 15, 2016, and continuing thereafter to the date of this Indictment, in the Northern District of Oklahoma and elsewhere, the defendants, **TIMOTHY JAMES RAY IGNATOVICH**, a/k/a "Iggy", a/k/a "TJ", and **JOSHUA EDWARD KREPPS**, knowingly and willfully conspired and agreed together, and with persons known and unknown to the Grand Jury, to seize, confine, kidnap, and abduct an adult female whose identity is known to the Grand Jury ("Person A"), a violation of Title 18, United States Code, Section 1201(a)(1).

**OVERT ACTS**

2. In furtherance of the conspiracy, and to accomplish its object, one or more of the defendants and others engaged in the following overt acts, among others:

3. On or about June 15, 2016, defendants **IGNATOVICH** and **KREPPS** approached and got into Person A's silver Cadillac that was occupied by Person A and her two children, whose identities are known to the Grand Jury ("Child A" and "Child B").

4. On or about June 15, 2016, defendants **IGNATOVICH** and **KREPPS** guarded Person A, Child A, and Child B, preventing them from leaving the vehicle.

5. On or about June 15, 2016, defendant **IGNATOVICH** used **KREPPS'** cellular telephone to call another associate for instructions on what to do with Person A.

6. On or about June 15, 2016, defendants **IGNATOVICH** and **KREPPS** threatened to knock Person A's teeth down her throat, to take her car, and "finish her."

All in violation of Title 18, United States Code, Section 1201(c).

**COUNT TWO**  
**[18 U.S.C. §§ 1201(a)(1) and 1201(d)]**

7. The allegations contained in paragraphs 1 through 6 of Count 1 are re-alleged and incorporated as if fully set forth herein.

8. On or about June 15, 2016, in the Northern District of Oklahoma, the defendants, **TIMOTHY JAMES RAY IGNATOVICH**, a/k/a “Iggy”, a/k/a “TJ”, and **JOSHUA EDWARD KREPPS**, each aiding and abetting the other, knowingly and unlawfully seized, confined, kidnapped, and abducted Person A, and attempted to do so, for a benefit to the defendants, and, in committing and in furtherance of the commission of the offense, used any means, facility, and instrumentality of interstate and foreign commerce.

All in violation of Title 18, United States Code, Sections 1201(a)(1) and 1201(d), and Title 18, United States Code, Section 2.

**COUNT THREE**  
**[18 U.S.C. §§ 1201(a)(1), 1201(d), and 1201(g)]**

9. The allegations contained in paragraphs 1 through 6 of Count 1 are re-alleged and incorporated as if fully set forth herein.

10. On or about June 15, 2016, in the Northern District of Oklahoma, the defendants, **TIMOTHY JAMES RAY IGNATOVICH**, a/k/a “Iggy”, a/k/a “TJ”, and **JOSHUA EDWARD KREPPS**, each over the age of 18 years, each aiding and abetting the other, knowingly and unlawfully seized, confined, kidnapped, and abducted nine-year-old Child A, and attempted to do so, who was neither a relative nor in the legal custody of the defendants, for a benefit to the defendants, and, in committing and in furtherance of the commission of the offense, used any means, facility, and instrumentality of interstate and foreign commerce.

All in violation of Title 18, United States Code, Sections 1201(a)(1), 1201(d), and 1201(g), and Title 18, United States Code, Section 2.

**COUNT FOUR**  
**[18 U.S.C. §§ 1201(a)(1), 1201(d), and 1201(g)]**

11. The allegations contained in paragraphs 1 through 6 of Count 1 are re-alleged and incorporated as if fully set forth herein.

12. On or about June 15, 2016, in the Northern District of Oklahoma, the defendants, **TIMOTHY JAMES RAY IGNATOVICH**, a/k/a “Iggy”, a/k/a “TJ”, and **JOSHUA EDWARD KREPPS**, each over the age of 18 years, each aiding and abetting the other, knowingly and unlawfully seized, confined, kidnapped, and abducted eight-year-old Child B, and attempted to do so, who was neither a relative nor in the legal custody of the defendants, for a benefit to the defendants, and, in committing and in furtherance of the commission of the offense, used any means, facility, and instrumentality of interstate and foreign commerce.

All in violation of Title 18, United States Code, Sections 1201(a)(1), 1201(d), and 1201(g), and Title 18, United States Code, Section 2.

**COUNT FIVE**  
**[18 U.S.C. §§ 922(g) and 924(a)(4)]**

13. On or about June 15, 2016, in the Northern District of Oklahoma, the defendant, **TIMOTHY JAMES RAY IGNATOVICH**, a/k/a “Iggy”, a/k/a “TJ”, after having been convicted of crimes punishable by imprisonment for terms exceeding one year, to wit:

- a. Unlawful Possession of a Controlled Drug, Case No. CF-2010-118, in the District Court in and for Tulsa County, State of Oklahoma, on December 13, 2011;
- b. Unlawful Possession of a Controlled Drug (Count 1), Case No. CF-2010-2875, in the District Court in and for Tulsa County, State of Oklahoma, on December 13, 2011;
- c. Unlawful Possession of a Controlled Drug (Count 1), Case No. CF-2011-2095, in the District Court in and for Tulsa County, State of Oklahoma, on December 15, 2011;
- d. Endeavoring to Manufacture Controlled Drug – Methamphetamine (Count 1), Case No. CF-2011-2959, in the District Court in and for Tulsa County, State of Oklahoma, on December 15, 2011; and
- e. Unlawful Possession of a Controlled Drug – Methamphetamine (Count 2), Case No. CF-2011-2959, in the District Court in and for Tulsa County, State of Oklahoma, on December 15, 2011,

knowingly possessed in and affecting interstate commerce the following firearm and ammunition:

- a. One (1) CZ (Ceska Zbrojovka), Model 75 B, 9mm Luger caliber pistol, s/n: A657743; and
- b. Seventeen (17) rounds of Speer brand 9mm Luger caliber ammunition.

All in violation of Title 18, United States Code, Section 922(g)(1) and 924(a)(2).

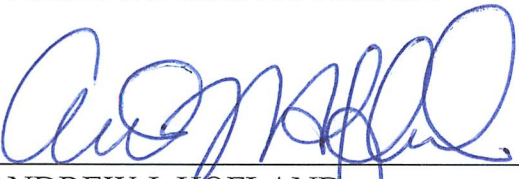
**COUNT SIX**  
**[18 U.S.C. § 924(c)(1)(A)(i)]**

14. On or about June 15, 2016, in the Northern District of Oklahoma, the defendant, **TIMOTHY JAMES RAY IGNATOVICH**, a/k/a “Iggy”, a/k/a “TJ”, knowingly carried and used a firearm, that is, a CZ (Ceska Zbrojovka), Model 75 B, 9mm Luger caliber pistol, s/n: A657743, during and in relation to crimes of violence for which he may be prosecuted in a court of the United States, that is, Kidnapping, as more fully set forth in Counts Two through Four of this Indictment.

All in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

DANNY C. WILLIAMS, SR.  
UNITED STATES ATTORNEY

A TRUE BILL

  
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ANDREW J. HOFLAND  
Assistant United States Attorney

/s/ Grand Jury Foreperson  
Grand Jury Foreperson